

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**MICHAEL J. BYNUM AND CANADA
HOCKEY LLC d/b/a EPIC SPORTS**

Plaintiffs

v.

**BRAD MARQUARDT,
in his individual capacity**

Defendant.

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CIVIL ACTION NO. 4:17-cv-00181

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO
FILE RESPONSE TO DEFENDANT BRAD MARQUARDT’S
RULE 12(C) MOTION FOR JUDGMENT ON THE PLEADINGS**

Plaintiffs, Michael J. Bynum and Canada Hockey LLC d/b/a Epic Sports (“Plaintiffs”), file this Unopposed Motion for Extension of Time to file their Response to Defendant Brad Marquardt’s (“Defendant”) Rule 12(c) Motion for Judgment on the Pleadings, and in support thereof, would respectfully show the Court as follows:

1. Pursuant to Rule 7.2, Plaintiffs respectfully request an extension of time to submit their Response to Defendant’s Rule 12(c) Motion for Judgment on the Pleadings [DOC 285]. Defendant filed his Motion on April 2, 2025. Plaintiffs’ Response to Defendant’s Motion is currently due April 16, 2025.

2. Plaintiffs seek a thirty (30) day extension of time to respond, making its new deadline May 16, 2025. Lead counsel for Plaintiff is currently out of the country and the requested extension will provide Plaintiffs sufficient time to adequately respond to Defendant’s Motion without causing undue delay.

3. Counsel has conferred with counsel for Defendant, Ray Chester, via e-mail regarding the requested extension on April 8, 2025, wherein counsel for Defendant indicated he does not oppose the present Motion.

4. For the foregoing reasons, Plaintiffs, Michael J. Bynum and Canada Hockey LLC d/b/a

Epic Sports, respectfully requests the Court grant this Unopposed Motion for an Extension of Time to file their Response to Defendant Brad Marquardt's Rule 12(c) Motion for Judgment on the Pleadings and enter an order extending the deadline by thirty (30) days to **May 16, 2025**.

Respectfully submitted,

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF CONFERENCE

I certify that, on April 8, 2025, the parties conferred regarding the filing of this motion, and the other parties do not oppose this motion.

/s/ Andrew W. Coffman
Andrew W. Coffman

CERTIFICATE OF SERVICE

I certify that on April 15, 2025, this document was filed electronically and will be served on all counsel of record in accordance with the Federal Court of Civil Procedure via the Court's ECF system.

/s/ Andrew W. Coffman
Andrew W. Coffman

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CIVIL ACTION NO. 4:17-cv-00181

**ORDER GRANTING PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF
TIME TO FILE RESPONSE TO DEFENDANT BRAD MARQUARDT'S MOTION FOR
SUMMARY JUDGMENT**

Having considered the Unopposed Motion for Extension of Time to File Response to Defendant Brad Marquardt's Rule 12(C) Motion for Judgment on the Pleadings (the "Motion") filed by Plaintiffs Michael J. Bynum and Canada Hockey, LLC d/b/a Epic Sports,

IT IS HEREBY ORDERED that the Motion is **GRANTED** and Plaintiffs' deadline to respond to Defendant Brad Marquardt's Rule 12(C) Motion for Judgment on the Pleadings is extended by and through **May 16, 2025**.

SIGNED this _____ day of April, 2025.

Andrew S. Hanen
United States District Judge